

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

**IN RE: MI WINDOWS AND DOORS, INC.
PRODUCTS LIABILITY LITIGATION**

MDL NO: 2333

**LAKES OF SUMMERVILLE, INC. AND MI WINDOWS AND DOORS, INC. JOINT
PROPOSED TOPICS FOR SEPTEMBER 19, 2012
MULTIDISTRICT LITIGATION SCHEDULING CONFERENCE**

In anticipation of the September 19, 2012 Multidistrict Litigation (“MDL”) Scheduling Conference, Plaintiff Lakes of Summerville, Inc. and Defendant MI Windows and Doors, Inc. (“MIWD”), hereby jointly submit the following suggested topics.

I. GENERAL TOPICS FOR CONSOLIDATED ACTIONS

1. Case Management Order No. 2
2. Case Management Order No. 3
3. Confidentiality Agreement entered, and entry of Stipulated Clawback Order;
4. Document Depository;
5. Discovery scope and limitations as to merits and class certification;
6. Discovery scope and limitations as to electronically-stored information;
7. Plaintiff Profile Forms;
8. Home Inspections;
9. Joinder of Lakes of Summerville and *Johnson*;
10. Settlement and Alternative Resolutions.

Dated: September 18, 2012

Respectfully submitted,

s/ Catherine H. McElveen

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Attorneys for Lakes of Summerville, Inc. Attorneys for MI Windows and Doors, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of September 2012, I electronically filed the foregoing with the United States District Court for South Carolina by using the CM/ECF system, which will send a notice of electronic filing to all counsel or parties of record.

/s/ Carol C. Lumpkin

Carol C. Lumpkin